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May 26, 2023

VIA PRIORITY MAIL:

Ken Murata

Senior Vice President & General Counsel

Samsung Electronics North America

85 Challenger Road

Ridgefield Park, NJ 07660

Samsung Electronics North America

Re: Chris Yoon

Greetings:

I represent Chris Yoon concerning an employment dispute with Samsung Electronics North America ("Samsung") and related parties. The purpose of this letter is to notify you of Mr. Yoon's complaint and to propose a fair resolution. After investigating this matter, it is clear that Samsung terminated Mr. Yoon because of his religious expression. Samsung's actions violate Title VII of the Civil Rights Act of 1964 and the Texas Labor Code.

Mr. Yoon began working for Samsung North America in February 2020. For the duration of his employment, Mr. Yoon always gave his best efforts to Samsung. Mr. Yoon had every intention of working for Samsung through the remainder of his career. Indeed, by any objective measure, Mr. Yoon was an exemplary employee of Samsung.

As an evangelical Christian, Mr. Yoon incorporates Biblical principles into every aspect of his life. Mr. Yoon turned to social media to share his beliefs. In mid 2020, Mr. Yoon achieved a significant level of success, exceeding 100,000 subscribers and regularly achieving hundreds of thousands of views or more.

Unfortunately, despite Mr. Yoon utilizing his own personal social media, Samsung was uncomfortable with Mr. Yoon's religious beliefs. In January 2021, a human resources representative, along with a representative from Samsung's legal department, met with Mr. Yoon. During this meeting, they explained they had audited all of his videos and noted that the videos were religious in nature. They explained that Mr. Yoon needed to take down a video in which he shared his personal testimony regarding the joy and benefit in living such a life for the Lord.

On December 5, 2022, Samsung fired Mr. Yoon. The stated reason for termination was Mr. Yoon's Christian YouTube platform.

Samsung's actions violated Title VII of the Civil Rights Act of 1964 when it terminated Mr. Yoon due to his religion. In an effort to resolve this matter, Mr. Yoon offers to waive any and all claims he may have against Samsung and related parties in exchange for \$750,000.00. Such a severance would include standard terms such as confidentiality, mutual non-disparagement, no rehire/reapplication, neutral reference, and taxation.

Please give this matter your immediate attention. I request a response by Monday, June 12, 2023.

Sincerely yours,  
**ROB WILEY, P.C.**

/s/ Harjeen Zibari  
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